

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

EUGENE KLINE, et al.,)	CASE NO. 3:08cv408
)	
Plaintiffs,)	JUDGE WALTER HERBERT RICE
)	
vs.)	
)	
)	
MORTGAGE ELECTRONIC SECURITY)	DEFENDANT REIMER, ARNOVITZ,
SYSTEMS, et al.,)	CHERNEK & JEFFREY CO., L.P.A.
)	(F.K.A. DEFENDANT REIMER,
Defendants.)	LORBER & ARNOVITZ CO.,
)	L.P.A.)'S MOTION FOR EXTENSION
)	OF TIME TO FILE OPPOSITION TO
)	60(b) MOTION
)	

Defendant Reimer, Arnovitz, Chernek & Jeffrey Co., L.P.A. (F.K.A. Reimer, Lorber & Arnovitz Co., L.P. A.), (the "Reimer Firm"), by and through the undersigned attorneys, pursuant to Local Rule 6.1(b), hereby files this motion for extension of time. On January 28, 2016, Plaintiff filed a Motion for Relief from Judgment pursuant to Rule 60(b). (ECF No. 498). On January 29, 2016, Defendants Barclays Capital Real Estate, Inc., Wells Fargo Bank, N.A., as Trustee, and Mortgage Electronic Registration Systems, Inc. filed a motion for a two-week extension of time to respond to Plaintiff's Motion for Relief from Judgment under Rule 60(b). On February 1, 2016, this Court granted the co-Defendants' motion for extension until March 3, 2016 to file a brief in opposition to Plaintiff's Motion. (ECF No. 501).

Plaintiff also recently filed a motion for reconsideration of this Court's previous Order granting summary judgment in favor of the Defendants. As such, additional time is needed to respond.

The undersigned Defendant requests that this Court grant a two-week motion for extension to file an opposition to Plaintiff's Motion for Relief from judgment. A two-week extension will not prejudice the Plaintiff or otherwise delay these proceedings, as this Court has previously granted the co-Defendants a two-week extension, up to March 3, 2016. Plaintiff has made improper and scandalous accusations that need to be addressed, and Defendant needs the additional time to respond to the motion and develop its arguments.

WHEREFORE, for the forgoing reasons, Defendants respectfully request that this Court enter an Order extending the time within which it has to file its Brief in Opposition to Plaintiff's Rule 6(b) Motion for Relief from Judgment, until March 3, 2016. A Proposed Order is attached as Exhibit A.

Respectfully submitted,

s/Lori E. Brown

TIMOTHY T. BRICK (0040526)

LORI E. BROWN (0071480)

GALLAGHER SHARP LLP

Sixth Floor - Bulkley Building

1501 Euclid Avenue

Cleveland, Ohio 44115

(216) 241-5310 (phone)

(216) 241-1608 (fax)

tbrick@gallaghersharp.com

lbrown@gallaghersharp.com

Attorneys for Defendant

Reimer, Arnovitz, Chernek & Jeffrey Co.

*L.P.A. (f.k.a. Reimer, Lorber & Arnovitz
Co., L.P.A.)*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2016, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/Lori E. Brown

TIMOTHY T. BRICK (0040526)

LORI E. BROWN (0071480)

Attorneys for Defendant

*Reimer, Arnovitz, Chernek & Jeffrey Co.
L.P.A. (f.k.a. Reimer, Lorber & Arnovitz
Co., L.P.A.)*